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Attorneys for Defendant
RAMESH "SUNNY" BALWANI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOLMES, et al.,

Defendants.

Case No. 18-CR-00258-EJD

**DECLARATION OF JEFFREY B.
COOPERSMITH IN SUPPORT OF
DEFENDANT RAMESH "SUNNY"
BALWANI'S ADMINISTRATIVE
MOTION TO SEAL EXHIBITS A, C, F-
M, O, T, W, AND X IN SUPPORT OF
MOTION TO DISMISS SECOND AND
THIRD SUPERSEDING INDICTMENTS**

Judge: Honorable Edward J. Davila

DECLARATION OF JEFFREY B. COOPERSMITH

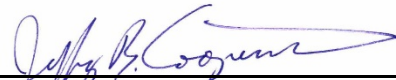
I, Jeffrey B. Coopersmith, declare as follows:

1. I am lead counsel for defendant Ramesh “Sunny” Balwani in this case. I am an attorney admitted to practice in the State of California. I am a partner at the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of record for Mr. Balwani. I submit this declaration in support of Mr. Balwani’s Administrative Motion to Seal pursuant to Criminal LR 56-1 Exhibits A, C, F–M, O, T, W, and X in support of Mr. Balwani’s Motion to Dismiss Second and Third Superseding Indictments (the “Motion to Dismiss”). I have personal knowledge of the facts stated here.

2. Mr. Balwani requests Exhibits A, C, F–M, O, T, W, and X in support of the Motion to Dismiss to be filed under seal because each relates to and contains information which have been designated as “Confidential Material” pursuant to the July 2, 2018 and July 17, 2019, Protective Orders in this case (Dkt. Nos. 28 and 90).

I declare under penalty of perjury that the foregoing is true and correct.

Executed August 28, 2020 at Seattle, Washington.



JEFFREY B. COOPERSMITH